

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	No. 12-md-02311
	:	Hon. Marianne O. Battani
	:	

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In Re: Heater Control Panels	:	Case No. 2:12-cv-00403
In Re: Occupant Safety Systems	:	Case No. 2:12-cv-00603
In Re: Switches	:	Case No. 2:13-cv-01303
In Re: Ignition Coils	:	Case No. 2:13-cv-01403
In Re: Steering Angle Sensors	:	Case No. 2:13-cv-01603
In Re: Electric Powered Steering Assemblies	:	Case No. 2:13-cv-01903
In Re: Fuel Injection Systems	:	Case No. 2:13-cv-02203
In Re: Valve Timing Control Devices	:	Case No. 2:13-cv-02503
In Re: Air Conditioning Systems	:	Case No. 2:13-cv-02703
In Re: Automotive Constant Velocity Joint Boot Products	:	Case No. 2:14-cv-02903
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In Re: Automotive Hoses	:	Case No. 2:15-cv-03203
In Re: Shock Absorbers	:	Case No. 2:15-cv-03303
In Re: Body Sealing Products	:	Case No. 2:16-cv-03403
In Re: Interior Trim Products	:	Case No. 2:16-cv-03503
In Re: Automotive Brake Hoses	:	Case No. 2:16-cv-03603
In Re: Exhaust Systems	:	Case No. 2:16-cv-03703
In Re: Ceramic Substrates	:	Case No. 2:16-cv-03803
In Re: Power Window Switches	:	Case No. 2:16-cv-03903
In Re: Automotive Steel Tubes	:	Case No. 2:16-cv-04003
In Re: Side-Door Latches	:	Case No. 2:17-cv-04303
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THIS DOCUMENT RELATES TO:	:	
End-Payor Actions	:	

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**DECLARATION OF BRIAN A. PINKERTON REGARDING JULY 2019 NOTICE  
DISSEMINATION AND SETTLEMENT ADMINISTRATION**

I, BRIAN A. PINKERTON, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an employee of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and formerly an Assistant Director at Garden City Group, LLC (“GCG”). In 2018, Epiq acquired GCG—the Court-appointed Settlement Administrator<sup>1</sup>—and became its successor. All references to “Epiq” herein incorporate the work performed while operating as either GCG or Epiq. The following statements are based on my personal knowledge and information provided by other experienced Epiq employees working under my supervision, and, if called on to do so, I could and would testify competently thereto.

### **PROCEDURAL HISTORY**

2. On October 13, 2015, GCG was appointed as the Settlement Administrator pursuant to Paragraph 5 of the Court’s Corrected Order Granting End-Payor Plaintiffs’ (“EPPs”) Motion for Authorization to Disseminate Notice to the End-Payor Plaintiff Settlement Classes (“Initial Notice Order”) in connection with the settlements between EPPs and Hitachi Automotive Systems, Ltd. (“HIAMS”), T.RAD Co., Ltd., and T.RAD North America, Inc. (together “T.RAD”). *See, e.g., Alternators*, 2:13-cv-00703, ECF No. 55. The Initial Notice Order approved (i) the initial notice program; and (ii) authorized EPPs to disseminate notice concerning settlements reached with HIAMs and T.RAD (“Initial Notice”).

3. As set forth in the Initial Notice Order, Epiq, as the successor to GCG, has responsibilities that include, among other things: (1) creating and maintaining a toll-free helpline for potential members of the Settlement Classes; and (2) creating and maintaining a dedicated Settlement Website, which houses pertinent information including important deadlines and

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<sup>1</sup> All capitalized terms not otherwise defined in this document shall have the meaning ascribed to them in the applicable EPP settlement agreements.

answers to frequently asked questions, where individuals can view documents relevant to the Settlements and can register online to have a copy of the long form notice mailed to them directly. Epiq's duties also include mailing direct notice to individuals who request direct notice as well as establishing a dedicated P.O. Box for the Settlements and handling mail received, such as objections, exclusion requests, requests for direct notice, and inquiries from potential members of the Settlement Classes.

### ***Round 1***

4. On January 13, 2016, Lori L. Castaneda executed a declaration to update the Parties and the Court as to the status of the dissemination of the notice program in connection with EPPs' settlements with HIAMs and T.RAD ("Initial Notice Program"), in compliance with the Initial Notice Order.

5. On January 26, 2016, the Court entered an Order granting EPPs' Motion for Authorization to Disseminate Combined Notice to the EPP Settlement Classes ("Combined Notice Order"): (i) approving the combined notice program ("Combined Notice Program"); and (ii) authorizing EPPs to disseminate an updated, combined notice ("Combined Notice") concerning settlements reached with nine defendant families and their affiliates, in addition to HIAMs and T.RAD (collectively, "Round 1 Settlements"). *See, e.g., Wire Harness*, 2:13-cv-00103, ECF No. 421.

6. Similarly, in accordance with the Combined Notice Order, on March 25, 2016, Lori L. Castaneda executed a supplemental declaration reporting on the status of dissemination of the updated long form notice ("Updated Long Form Notice") and updated summary form notice concerning EPPs' settlements with the Defendants included in the Round 1 Settlements.

***Round 2***

7. On October 7, 2016, the Court entered an Order Granting EPPs' Unopposed Motion for Authorization to Disseminate September 2016 Notice and Claim Form to the End-Payor Plaintiffs Settlement Classes ("September 2016 Notice Order") in connection with EPPs' settlements with an additional 12 defendant families and their affiliates (collectively, "Round 2 Settlements"). The September 2016 Notice Order: (i) approved the proposed September 2016 notice program ("September 2016 Notice Program"), long form notice ("September 2016 Long Form Notice"), and summary form notice ("September 2016 Summary Notice") (together, "September 2016 Notice Forms"); (ii) approved the proposed Claim Form ("Claim Form"); and (iii) authorized EPPs to disseminate the Claim Form and September 2016 Notice Forms. *See, e.g., Wire Harness*, Case No. 2:12-cv-00103, ECF No. 535.

8. In compliance with the September 2016 Notice Order, Epiq's responsibilities include, but are not limited to: (1) publishing relevant documents on the Settlement Website; and (2) sending direct email or mail notice to those individuals who previously registered on the Settlement Website, notifying them about the Round 2 Settlements and EPPs' plan to distribute proceeds from the Round 1 and 2 Settlements ("Plan of Allocation"), and directing them to visit the Settlement Website to read updated information about the Round 2 Settlements and Plan of Allocation.

9. In accordance with the September 2016 Notice Order, on February 9, 2017, Lori L. Castaneda executed a declaration regarding dissemination of the September 2016 Notice and compliance with the Court's September 2016 Notice Order.

10. Similarly, in accordance with the September 2016 Notice Order, on April 5, 2017, Lori L. Castaneda executed a supplemental declaration to update the Parties and the Court as to

the status of the Settlement Administrator's performance of its duties, including handling communications relating to the Settlements, and disseminating notice to potential members of the Settlement Classes in accordance with the Court's September 2016 Notice Order.

***Round 3***

11. On March 13, 2018, the Court entered an Order Granting EPPs' Unopposed Motion for Authorization to Disseminate March 2018 Notice to the End-Payor Plaintiffs Settlement Classes ("March 2018 Notice Order") in connection with EPPs' settlements with an additional 32 Defendants and their affiliates (collectively, "Round 3 Settlements"). The March 2018 Notice Order: (i) approved the proposed March 2018 notice program ("March 2018 Notice Program"), long-form notice ("March 2018 Long Form Notice"), and short-form notice ("March 2018 Summary Notice") (together, "March 2018 Notice Forms"); (ii) approved the proposed Claim Form ("Claim Form"); and (iii) authorized EPPs to disseminate the Claim Form and March 2018 Notice Forms. *See, e.g., Wire Harness*, Case No. 2:12-cv-00103, ECF No. 601.

12. In accordance with the March 2018 Notice Order, on June 13, 2018, I executed a declaration regarding dissemination of the March 2018 Notice and compliance with the Court's March 2018 Notice Order.

13. Similarly, in accordance with the March 2018 Notice Order, on July 26, 2018, I executed a supplemental declaration to update the Parties and the Court as to the status of the Settlement Administrator's performance of its duties, including handling communications relating to the Settlements, and disseminating notice to potential members of the Settlement Classes in accordance with the Court's March 2018 Notice Order.

***Round 4***

14. On August 2, 2019, the Court entered an Order Granting EPPs' Second Amended Unopposed Motion for Authorization to Disseminate July 2019 Notice to the End-Payor Plaintiff Settlement Classes ("July 2019 Notice Order") in connection with EPPs' settlements with an additional 17 Defendants and their affiliates (collectively, "Round 4 Settlements"). The July 2019 Notice Order: (i) approved the proposed July 2019 notice program ("July 2019 Notice Program"), long-form notice ("July 2019 Long Form Notice"), and short-form notice ("July 2019 Summary Notice") (together, "July 2019 Notice Forms"); (ii) approved the proposed Claim Form ("Claim Form"); and (iii) authorized EPPs to disseminate the Claim Form and July 2019 Notice Forms. *See, e.g., Heater Control Panels*, 2:12-cv-00403, ECF No. 291.

15. I submit this Declaration, in compliance with Paragraph 9 of the Court's July 2019 Notice Order, to update the Parties and the Court about the status of Epiq's performance of its duties as Settlement Administrator, including handling communications relating to the Settlements, receiving and reviewing claims, and disseminating notice to potential members of the Settlement Classes in accordance with the Court's July 2019 Notice Order.

**SETTLEMENT WEBSITE**

16. Pursuant to Paragraph 7 of the Initial Notice Order, with the settlements of Rounds 1 through 3, GCG established and Epiq maintains a website for the Settlements, [www.AutoPartsClass.com](http://www.AutoPartsClass.com), to answer frequently asked questions, receive online registrations and claims, as well as provide Settlement information and important deadlines to potential members of the Settlement Classes. Users of the Settlement Website can review documents relevant to the Settlements, including the Initial Notice, Combined Notice, September 2016 Notice, March 2018 Notice, and July 2019 Notice. A list of the single non-settling Defendant Group in Exhaust Systems

is also available on the Settlement Website as is a list of the included auto parts and list of the vehicles that are currently known to be included in the Rounds 1, 2, 3, and 4 Settlements. Visitors to the Settlement Website can also file claims on the Settlement Website. In connection with the Round 1, Round 2, and Round 3 Settlements, Epiq received 117,581 registrations or claims from potential members of the Settlement Classes who registered or filed claims on the Settlement Website or by contacting the Settlement Administrator through other means. The Settlement Website has been operational since October 12, 2015, and is accessible 24 hours a day, seven days a week.

17. Pursuant to Paragraph 5 of the July 2019 Notice Order, on September 9, 2019, Epiq updated the Settlement Website so that the homepage, frequently asked questions page, and court documents page, all include information pertaining to the Round 4 Settlements.<sup>2</sup> Epiq also added the Complaints, Settlement Agreements, and Preliminary Approval Orders applicable to the Round 4 Settlements, as well as the Motion to Disseminate July 2019 Notice, July 2019 Notice, and the July 2019 Notice Order. The website also still includes all documents pertaining to the Round 1, Round 2, and Round 3 Settlements, which members of the Settlement Class can reference or download. The updated version of the previously-approved Claim Form, which was approved by the Court's July 2019 Notice Order, was also made available on the website on September 9, 2019. A copy of the updated Claim Form is attached hereto as **Exhibit A**.

18. Epiq continued to implement additional updates to the Settlement Website after September 9, 2019. An updated version of the video summary was added to the website on September 26, 2019. Epiq further updated the Settlement Website on September 26, 2019 by adding the proposed Revised Plan of Allocation, which was filed in connection with the Round 4

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<sup>2</sup> Vehicle lists relating to the TKH and Showa Settlements have not yet been added.

Settlements. Epiq will continue to maintain and update the Settlement Website throughout the administration of the Settlements. As of October 28, 2019, the Settlement Website has received 2,565,280 visits from 2,175,529 unique visitors.

#### **TOLL-FREE TELEPHONE NUMBER**

19. In accordance with Paragraph 7 of the Initial Notice Order, GCG reserved a designated toll-free telephone number, 1-877-940-5043, in order to accommodate inquiries regarding the Settlements. On October 16, 2015, GCG made the toll-free hotline operational with an Interactive Voice Response (“IVR”) system. Callers have the ability to listen to important information about the Settlements 24-hours a day, seven days per week. If callers have additional questions or wish to request a copy of the July 2019 Notice or the Claim Form, they also have the ability to speak to a live customer service representative Monday through Friday, between the hours of 8:30 a.m. and 5:00 p.m. Eastern Time. In compliance with the July 2019 Notice Order, on September 9, 2019, Epiq updated the IVR to notify callers of the Round 4 Settlements. As of October 28, 2019, there have been 34,222 calls to the IVR totaling 190,563 minutes. As of October 28, 2019, Epiq has fielded 11,355 live calls from potential members of the Settlement Classes. Epiq will continue to maintain and update the IVR throughout the administration of the Settlements.

#### **DISSEMINATING DIRECT NOTICE**

20. As part of its role as Settlement Administrator, Epiq routinely mails copies of the current version of the long form notice to all individuals who request to have a copy of the notice mailed to them directly. Epiq established a secure online registration portal on the dedicated Settlement Website where individuals can enter their contact information and register to have a notice mailed to them.



21. In connection with the Round 1, Round 2, and Round 3 Settlements, Epiq and its predecessor mailed 70,368 copies of the prior versions of the long form notice to potential members of the Settlement Classes who registered on the Settlement Website or provided their contact information by contacting the Settlement Administrator directly through other means.

22. As of September 15, 2019, Epiq discontinued mailing previous, old versions of the long form notice, and began mailing the new, updated July 2019 Long Form Notice to all individuals who provided their name and address and requested to have a copy mailed to them. As of October 28, 2019, Epiq has mailed a total of 601 copies of the July 2019 Long Form Notice to individuals who requested a copy by contacting the toll-free number or by contacting the Settlement Administrator through other means. As of October 28, 2019, there are 49 additional individuals who have registered to receive notice since the last mailing, and Epiq will mail a copy of the July 2019 Long Form Notice to each of them. A true and correct copy of the July 2019 Long Form Notice is attached hereto as **Exhibit B**.

23. As of October 28, 2019, Epiq has received nine July 2019 Long Form Notices returned by USPS without forwarding address information as undeliverable mail. For all notices returned by the USPS without a forwarding address, Epiq compares the undeliverable address against the National Change of Address (“NCOA”) database maintained by the U.S. Post Office to locate a more current mailing address. When a more current address is located, Epiq re-mails the notice to the updated address.

24. In accordance with the July 2019 Notice Program, Epiq’s responsibilities include notifying individuals who previously registered on the Settlement Website about the Round 4 Settlements and Plan of Allocation, and directing them to visit the Settlement Website for updated information about the Round 4 Settlements and Plan of Allocation. In compliance with the July

2019 Notice Order, Epiq provided direct notice of the Round 4 Settlements and Plan of Allocation to all individuals who had previously registered or filed a claim prior to September 16, 2019. Direct notice of the Round 4 Settlements and Plan of Allocation was sent by email where a potentially valid email address was available (“Email Notice”) and by mail to those individuals who had not provided an email address or whose Email Notice was determined to be undeliverable.

25. On September 16, 2019, Epiq caused the Email Notice (attached hereto as **Exhibit C**) to be sent to each of the 71,670 individuals who previously registered or filed a claim for whom Epiq had a valid email address. Of those 71,670 Email Notices, 61,931 were delivered. 9,739 Email Notices could not be delivered for one or more of the following reasons: the email address no longer existed; the email account was closed inactive, or disabled; the email address had a bad domain name or address error; the recipient’s mailbox was full; or the recipient server was busy or unable to deliver.

26. Epiq also prepared and formatted a postcard notice (“Registrant Postcard Notice”) to be mailed to individuals who previously registered or filed a claim for whom Epiq did not have a valid email address or whose attempted Email Notice was undeliverable. Attached hereto as **Exhibit D** is a sample of the Registrant Postcard Notice that Epiq disseminated. On September 16, 2019, Epiq disseminated the Postcard Notice to each of the 23,085 individuals for whom Epiq did not have a valid email address but did have a valid mailing address. On September 18, 2019, Epiq disseminated the Registrant Postcard Notice to the 9,738 individuals whose attempted Email Notice was undeliverable and who had a valid mailing address. As of October 28, 2019, Epiq has received 286 Registrant Postcard Notices returned by the USPS with forwarding address information. Postcards returned by the USPS with forwarding address information were promptly re-mailed to the updated addresses provided. As of October 28, 2019, Epiq has received 1,968

Registrant Postcard Notices returned by the USPS without forwarding address information as undeliverable mail. For Registrant Postcard Notices returned by the USPS without a forwarding address, Epiq compares the undeliverable address against the NCOA database maintained by the U.S. Post Office to locate a more current mailing address. When a more current address is located, Epiq re-mails the postcard to the updated address.

27. In addition, Epic purchased a list of names and mailing addresses for registered fleet companies with ten or more registered vehicles. The list included 222,061 fleet companies. In accordance with the July 2019 Notice Program and in compliance with the Court's July 2019 Notice Order, on September 16, 2019, Epiq sent a postcard notice ("Fleet Postcard Notice") to each of the 222,061 fleet companies. Attached hereto as **Exhibit E** is a sample of the Fleet Postcard Notice that Epiq disseminated. As of October 28, 2019, Epiq has received 137 Fleet Postcard Notices returned by the USPS with forwarding address information. Postcards returned by the USPS with forwarding address information were promptly re-mailed to the updated addresses provided. As of October 28, 2019, Epiq has received 4,859 Fleet Postcard Notices returned by the USPS without forwarding address information as undeliverable mail. For Fleet Postcard Notices returned by the USPS without a forwarding address, Epiq compares the undeliverable address against the NCOA database maintained by the U.S. Post Office to locate a more current mailing address. When a more current address is located, Epiq re-mails the postcard to the updated address.

28. Finally, in accordance with the July 2019 Notice Program and in compliance with the Court's July 2019 Notice Order, Epiq caused email notice to be sent to a list of potential Settlement Class Members who purchased at least one vehicle included in the Settlements during the class periods and who currently reside in one of the 30 states eligible for monetary compensation or the District of Columbia. Commencing on September 16, 2019, Epiq caused

9,610,672 emails to be sent to potential Settlement Class Members. As of October 28, 2019, 1,026,084 of these emails have been opened by the recipient, and 105,064 of the potential Settlement Class Members have clicked a link in the email and been connected to the settlement website. A sample of the email notice sent to these potential Settlement Class Members is attached hereto as **Exhibit F**.

#### **SETTLEMENT P.O. BOX**

29. On February 19, 2015, GCG (Epiq's predecessor) reserved a designated P.O. Box for the administration of the Settlements: Auto Parts Settlements, P.O. Box 10163, Dublin, OH 43017-3163. Epiq monitors the Settlement P.O. Box for Settlement-related mail such as objections, exclusion requests, requests for direct notice or a paper Claim Form, inquiries about the Settlements, and the submission of Claim Forms and supporting documents. Epiq promptly handles all mail received at the Settlement P.O. Box.

#### **EXCLUSIONS**

30. Pursuant to Paragraph 10 of the July 2019 Notice Order, individuals who wish to exclude themselves from any or all of the Round 4 Settlement Classes are required to submit a written request for exclusion, received no later than November 19, 2019, to the Settlement Administrator. As of October 28, 2019, Epiq has not received any requests for exclusion from Round 4 Settlements.

#### **OBJECTIONS**

31. Pursuant to Paragraph 11 of the July 2019 Notice Order, in order to object to one or more of the Round 4 Settlements or to the Plan of Allocation, a member of the Round 4 Settlement Classes must submit a written objection to both the Settlement Administrator and the

Court, received no later than November 19, 2019. As of October 28, 2019, Epiq has not received any objections to Round 4 Settlements and/or Plan of Allocation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 30th day of October 2019, in Seattle, Washington.



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Brian A. Pinkerton

# Exhibit A

Auto Parts Settlements  
P.O. Box 10163  
Dublin, OH 43017-3163  
Toll-Free: 1-877-940-5043



## **AUTO PARTS CLASS CLAIM FORM**

### **TO SUBMIT A CLAIM FOR PAYMENT:**

- 1.) Complete all information below.
- 2.) You **must** provide your name and contact information.
- 3.) All information is subject to verification for accuracy by the Settlement Administrator.
- 4.) You **must** confirm that the information you provide is true and correct by signing the Claim Form. Unsigned Claim Forms will be denied.
- 5.) Submit the completed Claim Form to the Settlement Administrator listed below. You may go to [www.AutoPartsClass.com](http://www.AutoPartsClass.com) to submit your claim online, or you may transmit the Claim Form to:

Auto Parts Settlements  
P.O. Box 10163  
Dublin, OH 43017-3163

- 6.) If your contact information changes, please contact the Settlement Administrator at the address above to update your contact information.

**No documentation is required at this time, but please hold on to any documents that you have.  
The Settlement Administrator will contact you if additional information is needed.**



## SECTION I: CLAIMANT CONTACT INFORMATION

Name:

Address:

City:

State:

Zip:

Telephone Number:

 -  - 

Email Address:

Are you filing a claim for a business?

☐ Yes ☐ No

## SECTION II: PURCHASE/LEASE CLAIMS SECTION

Are you making a claim for the purchase or lease of a new vehicle?

☐ Yes ☐ No

How many vehicles are you claiming?

For each vehicle for which you are making a claim, please complete a row in the table below and provide all of the requested information (attach additional sheets if needed). **You can submit a claim even if you do not know your VIN.**

Vehicle Year	Vehicle Make	Vehicle Model	VIN (Vehicle Identification Number)	State of Residence or Principal Place of Business at Time of Purchase or Lease	Estimated Date of Purchase or Lease	Purchase or Lease?

To determine if your vehicle is included in the Settlements, please visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or contact the toll-free number below. Please note that additional vehicles may be identified at a later date.

If you need additional space to record more entries, you may attach additional sheets. Please be sure to include all of the information requested in the table above on any additional sheets that you attach.

To view Garden City Group, LLC's Privacy Notice, please visit <http://www.choosegcg.com/privacy>

QUESTIONS? VISIT [WWW.AUTOPARTSCCLASS.COM](http://WWW.AUTOPARTSCCLASS.COM) OR CALL TOLL-FREE 1-877-940-5043





# Exhibit B

## If You Bought or Leased a New Vehicle or Bought Certain Replacement Parts for a Vehicle in the U.S. Since 1990

**You Could Receive \$100 or More From Settlements Totaling Over \$1.2 Billion**

**Claims Deadline Set for December 31, 2019**

*A Federal Court authorized this Notice. This is not a solicitation from a lawyer.*

- Please read this Notice and the Settlement Agreements available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com) carefully. Your legal rights may be affected whether you act or don't act. This Notice is a summary, and it is not intended to, and does not, include all the specific details of each Settlement Agreement. To obtain more specific details concerning the Settlements, please read the Settlement Agreements.
- Separate lawsuits claiming that Defendants in each lawsuit entered into unlawful agreements that artificially raised the prices of certain component parts of qualifying new vehicles (described in Question 8 below) have been settled with 73 Defendants and their affiliates ("Settling Defendants"). Previously, settlements with 56 of the Settling Defendants ("Round 1 Settlements" totaling approximately \$225 million, "Round 2 Settlements" totaling approximately \$379 million, and "Round 3 Settlements" totaling approximately \$433 million) received final Court approval. Now, additional settlements totaling approximately \$184 million have been reached with 17 Settling Defendants. These Settling Defendants are called the "Round 4 Settling Defendants," and the settlements with them are called the "Round 4 Settlements." This Notice will give you details of those proposed Round 4 Settlements and your rights in these lawsuits.
- Generally, you are included in the Settlement Classes for the Round 4 Settlements if, at any time between 1990 and 2019, depending upon the component part, you: (1) bought or leased a qualifying new vehicle in the U.S. (not for resale) or (2) indirectly purchased a qualifying vehicle replacement part (not for resale). Indirectly means you bought the vehicle replacement part from someone other than the manufacturer of the part. To find out if your vehicle qualifies, go to [www.AutoPartsClass.com](http://www.AutoPartsClass.com).
- As more fully described in Question 8 below, the Round 4 Settling Defendants have agreed to pay approximately \$184 million to be made available to members of the Settlement Classes who purchased or leased a qualifying new vehicle or purchased a qualifying vehicle replacement part while residing in the District of Columbia or one or more of the following States: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin.
- With the exception of the Reorganized TK Holdings Trust ("TKH") and Delphi Technologies PLC and Delphi Powertrain Systems, LLC (together "Delphi"), the Round 4 Settlements also include provisions requiring the Round 4 Settling Defendants' cooperation in the ongoing litigations. With the exception of Toyota Gosei and TKH, the Round 4 Settling Defendants have also agreed not to engage in the specified conduct that is the subject of the lawsuits for a period of two years from a specified date.

<b>Your Legal Rights and Options</b>		
<b>SUBMIT A CLAIM</b>	The only way to get a payment. You will be able to submit a claim for payment from the Settlements in Rounds 1 through 4 (as applicable). If you already filed a claim in the Round 1, 2, or 3 Settlements, you do not need to submit another claim for those vehicles or replacement parts. You should also submit a claim if you have additional vehicles or replacement parts to report.	December 31, 2019
<b>EXCLUDE YOURSELF</b>	You will not be included in the Settlement Classes for the Round 4 Settlements from which you exclude yourself. You will receive no benefits from those Round 4 Settlements, but you will keep any rights you currently have to sue these Settling Defendants about	November 19, 2019

	the claims in the Settlement Classes from which you exclude yourself.	
<b>DO NOTHING</b>	You will be included in the Settlement Classes for the Round 4 Settlements and are eligible to file a claim for a payment (if you qualify). If you do not file a claim for a payment by the deadline, you will not receive a payment from the Settlements. You will give up your rights to sue the Round 4 Settling Defendants about the claims in these cases.	
<b>OBJECT TO THE SETTLEMENTS AND PLAN OF ALLOCATION</b>	If you do not exclude yourself, you can write to the Court explaining why you disagree with any of the Round 4 Settlements, the revised Plan of Allocation, or any requested award of attorneys' fees or costs.	November 19, 2019
<b>GO TO THE HEARING</b>	If you submit a written objection, you may ask to speak in Court about your opinion of the Round 4 Settlements.	December 10, 2019, at 11:00 a.m.

- These rights and options – and the deadlines to exercise them – are explained in this Notice.
- The Court in charge of these cases still has to decide whether to finally approve the Round 4 Settlements. Payments will only be made if the Court approves the Round 4 Settlements and the revised Plan of Allocation, and after any appeals are resolved.

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Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)

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## BASIC INFORMATION

### 1. WHY IS THERE A NOTICE?

This Notice is to inform you about the Round 4 Settlements reached in some of the pending cases that are included in this litigation, before the Court decides whether to finally approve these Settlements.

The Court in charge is the United States District Court for the Eastern District of Michigan. This litigation is known as *In re: Automotive Parts Antitrust Litigation*. Within this litigation there are several different lawsuits. The people who sued are called the “Plaintiffs.” The companies they sued are called the “Defendants.”

Previously, you may have received notice about the Round 1 Settlements, Round 2 Settlements, and Round 3 Settlements that were reached with 11, 12, and 33 Defendants, respectively. The Round 1 Settlements received final approval from the Court, as amended, on August 9, 2016. The Round 2 Settlements received final approval from the Court on July 10, 2017. The Round 3 Settlements received final approval from the Court on November 7, 2018.

Round 4 Settlements have been reached with 17 Defendants, so that is why there is another Notice. This Notice explains the lawsuits, proposed Round 4 Settlements, the revised Plan of Allocation, and your legal rights, including the ability to file a claim to receive a payment (if eligible).

### 2. WHAT ARE THESE LAWSUITS ABOUT?

Each lawsuit claims that the Defendants in that lawsuit agreed to unlawfully raise the price of a certain kind of vehicle component part. (For example, one lawsuit is called *In re: Radiators*, and the affected product is radiators.) As a result of the alleged agreements by Defendants, consumers and businesses who purchased or leased qualifying new vehicles (not for resale) containing those parts or who indirectly purchased qualifying replacement parts (not for resale) from the Defendants may have paid more than they should have. Although the Round 4 Settling Defendants have agreed to settle, they do not agree that they engaged in any wrongdoing or are liable or owe any money or benefits to Plaintiffs. The Court has not decided who is right.

### 3. WHO ARE THE ROUND 4 SETTLING DEFENDANTS?

The Round 4 Settling Defendants are:

1. Brose SchlieBsysteme GmbH & Co. Kommanditgesellschaft and Brose North America (together, “Brose”),
2. Corning International Kabushiki Kaisha and Corning Incorporated (together, “Corning”),
3. Delphi Technologies PLC and Delphi Powertrain Systems, LLC (together, “Delphi”),
4. Green Tokai Co., LTD. (“Green Tokai”),

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5. Keihin Corporation and Keihin North America, Inc. (together, “Keihin”),
6. KYB Corporation (f/k/a Kayaba Industry Co. Ltd) and KYB Americas Corporation (together, “KYB”),
7. Maruyasu Industries Co., Ltd. and Curtis Maruyasu America, Inc. (together, “Maruyasu”),
8. Meritor, Inc. f/k/a ArvinMeritor, Inc. (“ArvinMeritor”),
9. Mikuni Corporation (“Mikuni”),
10. Mitsubishi Heavy Industries America, Inc. and Mitsubishi Heavy Industries Climate Control, Inc. (collectively, “Mitsubishi”),
11. Panasonic Corporation and Panasonic Corporation of North America (together, “Panasonic”),<sup>1</sup>
12. Sanoh Industrial Co., Ltd. and Sanoh America, Inc. (collectively, “Sanoh”),
13. Showa Corporation and American Showa, Inc. (collectively, “Showa”),
14. Reorganized TK Holdings Trust (“TKH”),
15. Tokai Rika Co., Ltd. and TRAM, Inc. d/b/a Tokai Rika U.S.A. Inc. (together, “Tokai Rika”),<sup>2</sup>
16. Toyo Denso Co., Ltd. and Weastec, Inc. (together, “Toyo Denso”), and
17. Toyoda Gosei Co., Ltd.; Toyoda Gosei North America Corporation; TG Kentucky, LLC; TG Missouri Corp.; and TG Fluid Systems USA Corporation (collectively, “Toyoda Gosei”).

#### 4. HAVE THERE BEEN ANY OTHER SETTLEMENTS RELATED TO THIS LAWSUIT?

Yes. The following companies previously agreed to the Round 1 Settlements in the lawsuits:

1. Autoliv, Inc.; Autoliv ASP, Inc.; Autoliv B.V. & Co. KG; Autoliv Safety Technology, Inc.; and Autoliv Japan Ltd.,
2. Fujikura, Ltd. and Fujikura Automotive America LLC,
3. Hitachi Automotive Systems, Ltd. (partial settlement),
4. Kyungshin-Lear Sales and Engineering, LLC,
5. Lear Corporation,
6. Nippon Seiki Co., Ltd.; N.S. International, Ltd.; and New Sabina Industries, Inc.,
7. Panasonic Corporation and Panasonic Corporation of North America (partial settlement),
8. Sumitomo Electric Industries, Ltd.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc. (incorporating K&S Wiring Systems, Inc.); and Sumitomo Wiring Systems (U.S.A.) Inc.,
9. T.RAD Co., Ltd. and T.RAD North America, Inc.,
10. TRW Deutschland Holding GmbH and TRW Automotive Holdings Corporation (now known as “ZF TRW Automotive Holdings Corp.”), and
11. Yazaki Corporation and Yazaki North America, Incorporated.

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<sup>1</sup> Previously, Panasonic settled lawsuits related to HID Ballasts, Switches, and Steering Angle Sensors.

<sup>2</sup> Previously, Tokai Rika settled lawsuits related to Wire Harnesses.

The following companies previously agreed to the Round 2 Settlements in the lawsuits:

1. Aisin Seiki Co., Ltd. and Aisin Automotive Casting, LLC,
2. DENSO Corporation; DENSO International America, Inc.; DENSO International Korea Corporation; DENSO Korea Automotive Corporation; DENSO Automotive Deutschland GmbH; ASMO Co., Ltd.; ASMO North America, LLC; ASMO Greenville of North Carolina, Inc.; and ASMO Manufacturing, Inc.,
3. Furukawa Electric Co., Ltd. and American Furukawa, Inc.,
4. G.S. Electech, Inc.; G.S. Wiring Systems Inc.; and G.S.W. Manufacturing, Inc.,
5. LEONI Wiring Systems, Inc. and Leonische Holding Inc.,
6. Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; and Mitsubishi Electric Automotive America, Inc.,
7. NSK Ltd.; NSK Americas, Inc.; NSK Steering Systems Co., Ltd.; and NSK Steering Systems America, Inc.,
8. Omron Automotive Electronics Co. Ltd.,
9. Schaeffler Group USA Inc.,
10. Sumitomo Riko Co. Ltd. and DTR Industries, Inc.,
11. Tokai Rika Co., Ltd. and TRAM, Inc. d/b/a Tokai Rika U.S.A. Inc., and
12. Valeo Japan Co., Ltd. on behalf of itself and Valeo Inc.; Valeo Electrical Systems, Inc.; and Valeo Climate Control Corp.

The following companies previously agreed to the Round 3 Settlements in the lawsuits:

1. Aisan Industry Co., Ltd.; Franklin Precision Industry, Inc.; Aisan Corporation of America; and Hyundam Industrial Co., Ltd.,
2. ALPHA Corporation and Alpha Technology Corporation,
3. Alps Electric Co., Ltd.; Alps Electric (North America), Inc.; and Alps Automotive Inc.,
4. Robert Bosch GmbH and Robert Bosch LLC ,
5. Bridgestone Corporation and Bridgestone APM Company,
6. Calsonic Kansei Corporation and Calsonic Kansei North America, Inc.,
7. Chiyoda Manufacturing Corporation and Chiyoda USA Corporation,
8. Continental Automotive Electronics LLC; Continental Automotive Korea Ltd; and Continental Automotive Systems, Inc.,
9. Diamond Electric Mfg. Co., Ltd. and Diamond Electric Mfg. Corporation,
10. Eberspächer Exhaust Technology GmbH & Co. KG and Eberspächer North America Inc.,
11. Faurecia Abgastechnik GmbH; Faurecia Systèmes d'Échappement; Faurecia Emissions Control Technologies, USA, LLC; and Faurecia Emissions Control Systems, N.A. LLC f/k/a Faurecia Exhaust Systems, Inc.,
12. Hitachi Automotive Systems, Ltd.,
13. Hitachi Metals, Ltd.; Hitachi Cable America Inc.; and Hitachi Metals America, Ltd.,
14. INOAC Corporation; INOAC Group North America, LLC; and INOAC USA Inc.,
15. JTEKT Corporation; JTEKT Automotive North America, Inc.; and JTEKT North America Corp. (formerly d/b/a Koyo Corporation of U.S.A.),
16. Kiekert AG and Kiekert U.S.A., Inc.,
17. Koito Manufacturing Co., Ltd. and North American Lighting, Inc.,
18. MAHLE Behr GmbH & Co. KG and MAHLE Behr USA Inc.,

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19. MITSUBA Corporation and American Mitsuba Corporation,
20. Nachi-Fujikoshi Corp. and Nachi America Inc.,
21. NGK Insulators, Ltd. and NGK Automotive Ceramics USA, Inc.,
22. NGK Spark Plug Co., Ltd. and NGK Spark Plugs (U.S.A.), Inc.,
23. Nishikawa Rubber Company, Ltd.,
24. NTN Corporation and NTN USA Corporation,
25. Sanden Automotive Components Corporation; Sanden Automotive Climate Systems Corporation; and Sanden International (U.S.A.) Inc.,
26. SKF USA Inc.,
27. Stanley Electric Co., Ltd.; Stanley Electric U.S. Co., Inc.; and II Stanley Co., Inc.,
28. Tenneco Inc.; Tenneco GmbH; and Tenneco Automotive Operating Co., Inc.,
29. Toyo Tire & Rubber Co. Ltd.; Toyo Tire North America OE Sales LLC; and Toyo Automotive Parts (U.S.A.), Inc.,
30. Usui Kokusai Sangyo Kaisha, Ltd. and Usui International Corporation,
31. Valeo S.A.,
32. Yamada Manufacturing Co. Ltd. and Yamada North America, Inc., and
33. Yamashita Rubber Co., Ltd. and YUSA Corporation.

The Court has given final approval to the Round 1 Settlements. *See* Amended Opinion and Order Granting Final Approval to the Round 1 Settlements (August 9, 2016) (available on [www.AutoPartsClass.com](http://www.AutoPartsClass.com), under the “Court Documents” tab, in the “Final Approval” section).

The Court has also given final approval to the Round 2 Settlements. *See* Order Granting Final Approval to the Round 2 Settlements (July 10, 2017) (available on [www.AutoPartsClass.com](http://www.AutoPartsClass.com), under the “Court Documents” tab, in the “Final Approval” section).

The Court has given final approval to the Round 3 Settlements. *See* Order Granting Final Approval to the Round 3 Settlements (November 7, 2018) (available on [www.AutoPartsClass.com](http://www.AutoPartsClass.com), under the “Court Documents” tab, in the “Final Approval” section).

More information about these Settlements is available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

#### **5. WHO ARE THE NON-SETTLING DEFENDANTS?**

The only Non-Settling Defendants remaining are Bosal USA, Inc. and Bosal Industries-Georgia, Inc. (together “Bosal”) with respect to the sale of Exhaust Systems.

#### **6. WHAT VEHICLE PARTS ARE INCLUDED?**

The Round 4 Settlements generally include the vehicle component parts listed below. The specific definitions of the vehicle component parts are available in each Settlement Agreement. Each of those Settlement Agreements, and the related Complaints, are accessible on [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or can be obtained by calling 1-877-940-5043.

- **Air Conditioning Systems** are systems that cool the interior environment of a vehicle and are part of a vehicle’s thermal system. Air Conditioning Systems, whether sold together or separately,

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include one or more of the following: automotive compressors, condensers, HVAC units (typically consisting of a blower motor, actuators, flaps, evaporator, heater core, and filter embedded in a plastic housing), control panels, sensors, and associated hoses and pipes.

- **Automotive Brake Hoses** are flexible hoses that carry brake fluid through the hydraulic brake system of an automobile.
- **Automotive Constant-Velocity-Joint Boot Products** are composed of rubber or plastic and are used to cover the constant-velocity-joints of an automobile to protect the joints from contaminants.
- **Automotive Hoses** are flexible tubes used to convey liquid and air in vehicles. Automotive Hoses include low-pressure rubber hoses used in automobile engine compartments and plastic and resin tubes used in vehicle engine compartments and fuel tank modules.
- **Automotive Steel Tubes** are used in fuel distribution, braking, and other automotive systems. Automotive Steel Tubes are sometimes divided into two categories: chassis tubes and engine parts. Chassis tubes, such as brake and fuel tubes, tend to be located in the body of a vehicle. Engine parts, such as fuel injection rails, oil level tubes, and oil strainer tubes, are associated with the function of a vehicle's engine.
- **Body Sealing Products** are automotive body sealing parts. They are typically made of rubber and trim the doors, hoods, and compartments of vehicles. Body Sealing Products keep noise, debris, rainwater, and wind from entering the vehicle and control vehicle vibration. In some instances, they also serve as a design element. Body Sealing Products include body-side opening seals, door-side weather-stripping, glass-run channels, trunk lids, and other rubber sealings.
- **Ceramic Substrates** are uncoated ceramic monoliths with fine honeycomb structures that, after coating with a mix of metal and other chemicals, are incorporated into automotive catalytic converters.
- **Exhaust Systems** are systems of piping and other parts that convey noxious exhaust gases away from the passenger compartment and reduces the level of pollutants and engine exhaust noise emitted. An Exhaust System includes one or more of the following components: manifold, flex pipes, catalytic converter, oxygen sensor, isolator/gasket/clamps, resonator assemblies/pipe accessories, and muffler/muffler assemblies. An Exhaust System has a "hot end," which is the part of the Exhaust System that is mounted to the engine, which is generally comprised of a manifold and catalytic converter, and a "cold end," which is the part of the Exhaust System that is mounted to the underbody of the car, which generally contains a muffler, pipes, and possibly a catalytic converter.
- **Electronic Powered Steering Assemblies** which are defined to include electric power steering motors, provide electric power to assist the driver to more easily steer the automobile. Electronic Powered Steering Assemblies link the steering wheel to the tires, and include the column, intermediate shaft, electronic control unit, but do not include the steering wheel or tires. "Pinion-Assist Type Electronic Powered Steering Assemblies" provide power to the steering gear pinion shaft from electric motors to assist the driver to more easily steer the automobile. Pinion-Assist Type Electronic Powered Steering Assemblies include an electronic control unit and link the steering wheel to the tires, but do not include the column, intermediate shaft, steering wheel or tires.

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Electronic Powered Steering Assemblies include Pinion-Assist Type Electronic Powered Steering Assemblies as well as all component parts of the assemblies, including the steering column, intermediate shaft, electronic control unit, and electric power steering motors (but not the steering wheel or tires).

- **Fuel Injection Systems** admit fuel or a fuel/air mixture into vehicle engine cylinders. Fuel Injection Systems can also be sold as part of a broader system, such as an engine management system, or as separate components. Fuel Injection Systems include one or more of the following parts: injectors, high pressure pumps, rail assemblies, feed lines, engine electronic control units, fuel pumps and fuel pump modules, manifold absolute pressure sensors, pressure regulators, pulsation dampers, purge control valves, air flow meters, and electronic throttle bodies.
- **Heater Control Panels** are either mechanical or electrical devices that control the temperature of the interior environment of a vehicle. Heater Control Panels can be either manual (referred to as low-grade) or automatic (referred to as high-grade) and are located in the center console, back seat, or rear cabin of an automobile.
- **Ignition Coils** release electric energy to ignite the fuel/air mixture in cylinders.
- **Interior Trim Products** are automotive plastic interior trim parts. They do not include the main bodies of instrument panels and typically consist of molded trim parts made from plastics, polymers, elastomers, and/or resins manufactured and/or sold for installation in automobile interiors, including console boxes, assist grips, registers, center cluster panels, glove boxes, and glove box doors, meter cluster hoods, switch hole covers, and lower panel covers and boxes.
- **Occupant Safety Systems** are comprised of the parts in an automotive vehicle that protect drivers and passengers from bodily harm. Occupant Safety Systems include one or more of the following: seat belts, air bags, steering wheels or steering systems, and safety electronic systems.
- **Power Window Switches** are switches that raise or lower a vehicle's electric windows.
- **Side-Door Latches** secure an automotive door to a vehicle body and may be locked to prevent unauthorized access to a vehicle. Included in the Settlement are "Latch Minimodules," which include the Door Latch and all of the related mechanical operating components, including the electric lock function.
- **Shock Absorbers** are part of the suspension system on automobiles. They absorb and dissipate energy to help cushion vehicles on uneven roads, leading to improved ride quality and vehicle handling. Shock Absorbers are also called "dampers."
- **Steering Angle Sensors** detect the angle of the vehicle's direction and send signals to a vehicle computer, which in turn controls the vehicle stability during turns. Steering Angle Sensors are installed on the steering column of a vehicle and may be connected to part of a combination switch.
- **Switches** include one or more of the following: steering wheel switch (installed in the steering wheel), used to control functions within the vehicle; turn switch (installed behind the steering wheel), used to signal a left or right turn and control hi/lo beam selection; wiper switch (installed behind the steering wheel), used to activate the vehicle's windshield wipers; combination switch,

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a combination of the turn and wiper switches as one unit, sold together as a pair; and door courtesy switch (installed in the door frame), which activates the light inside the vehicle when the door opens.

- **Valve Timing Control Devices** control the opening/closing timing of the intake valve and exhaustive valve according to driving conditions and are part of the engine management system of the automotive market. Valve Timing Control Devices may also be referred to as “variable valve timing” systems.

#### 7. WHY ARE THESE CLASS ACTIONS?

In class actions, one or more individuals or companies called the “class representatives” sue on behalf of themselves and other people with similar claims in the specific class action. All of these individuals or companies together are the “Class” or “Class members.” In these Class actions, there are more than fifty Class representatives. In a class action, one court may resolve the issues for all Class members, except for those who exclude themselves from the Class.

#### WHO IS INCLUDED IN THE CLASSES

#### 8. HOW DO I KNOW IF I MAY BE INCLUDED IN THE ROUND 4 SETTLEMENT CLASSES?

Generally, you may be included in one or more of the Round 4 Settlement Classes if, at any time from 1990 to 2019, you: (1) bought or leased a qualifying new vehicle in the U.S. (not for resale), or (2) paid to replace one or more of the qualifying vehicle parts listed in Question 6 above (not for resale). In general, qualifying vehicles include new four-wheeled passenger automobiles, vans, sports utility vehicles, crossovers, and pickup trucks.

The specific definition of the vehicles, as well as the definition of who is included in the Round 4 Settlement Classes, is set forth in each Settlement Agreement. Each of those Settlement Agreements, and the related Complaints, are accessible at [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or can be obtained by calling 1-877-940-5043.

You will also be able to obtain additional information to learn whether you are a member of one or more of the Round 1, Round 2, Round 3, or Round 4 Settlement Classes by visiting [www.AutoPartsClass.com](http://www.AutoPartsClass.com) and providing details regarding your purchase or lease of a new vehicle or your purchase of a replacement part, calling 1-877-940-5043, or sending an email to [info@AutoPartsClass.com](mailto:info@AutoPartsClass.com).

A separate Settlement Class has been preliminarily approved by the Court in each of the following cases settled by the Round 4 Settling Defendants and their affiliates. The time period covered by the Round 4 Settlements for each of the Settlement Classes is provided below:

Defendant	Time Period Starts	Time Period Ends	Auto Part(s) Cases
Brose	January 1, 2004	June 14, 2018	Side-Door Latches
Corning	January 1, 1990	January 11, 2018	Ceramic Substrates

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Defendant	Time Period Starts	Time Period Ends	Auto Part(s) Cases
Delphi	January 1, 2000	June 21, 2019	Ignition Coils
Green Tokai	January 1, 2000	September 6, 2018	Body Sealing Products
Keihin	January 1, 2000	May 22, 2018	Fuel Injection Systems
KYB	January 1, 1995	November 6, 2018	Shock Absorbers
Maruyasu	January 1, 2000	October 15, 2018	Fuel Injection Systems
	December 1, 2003	October 15, 2018	Automotive Steel Tubes
Meritor	January 1, 2002	June 5, 2018	Exhaust Systems
Mikuni	January 1, 2000	June 18, 2019	Fuel Injection Systems Valve Timing Control Devices
Mitsubishi	May 1, 1999	June 15, 2018	Air Conditioning Systems
Panasonic	May 1, 1999	March 11, 2019	Air Conditioning Systems
Sanoh	December 1, 2003	April 10, 2019	Automotive Steel Tubes
Showa	January 1, 2005	July 10, 2019	Electronic Powered Steering Assemblies
	January 1, 1995	July 10, 2019	Shock Absorbers
TKH	January 1, 2003	November 27, 2018	Occupant Safety Systems
Tokai Rika	January 1, 2000	March 23, 2018	Heater Control Panels
	January 1, 2003	March 23, 2018	Occupant Safety Systems
	September 1, 2003	March 23, 2018	Steering Angle Sensors
	September 1, 2003	March 23, 2018	Switches
Toyo Denso	January 1, 2000	April 30, 2018	Ignition Coils

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Defendant	Time Period Starts	Time Period Ends	Auto Part(s) Cases
	January 1, 2003	April 30, 2018	Power Window Switches
Toyoda Gosei	February 1, 2004	July 20, 2018	Automotive Brake Hoses
	May 1, 2003	July 20, 2018	Automotive Hoses
	January 1, 2000	July 20, 2018	Body Sealing Products
	January 1, 2006	July 20, 2018	Automotive Constant-Velocity-Joint Boot Products
	June 1, 2004	July 20, 2018	Interior Trim Products
	January 1, 2003	July 20, 2018	Occupant Safety Systems

Payments to members of the Settlement Classes only will be made if the Court approves the Round 4 Settlements and after any appeals from such approval are resolved and in accordance with the proposed revised Plan of Allocation to distribute the Net Settlement Funds (*see* Question 13).

These cases are proceeding as class actions seeking monetary recovery for consumers and businesses in 30 states and the District of Columbia and for nationwide injunctive relief to stop the Defendants' alleged illegal behavior and prevent this behavior from happening in the future (*see* Question 15).

Purchasers or lessees of qualifying new vehicles or indirect purchasers of any of the replacement parts listed in Question 6 may be members of the Settlement Classes entitled to monetary recovery. Only those members of the Settlement Classes who, during the relevant time periods listed above, purchased or leased a vehicle or purchased a replacement part while (1) residing in or (2) as to businesses, having the principal place of business located in the District of Columbia or the states listed below will be entitled to share in the monetary recovery. Those states are: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin. You may have seen a prior notice that indicated that members of the Settlement Classes may be entitled to monetary recovery if the purchase or lease transaction occurred in the District of Columbia or one of the listed states. Please note that the prior information as to the place of the purchase or lease transaction is superseded by this notice.

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)

**9. WHO IS NOT INCLUDED IN THE SETTLEMENT CLASSES?**

The Settlement Classes do not include:

- Any of the Defendants, their parent companies, subsidiaries, and affiliates;
- Any co-conspirators;
- Federal government entities and instrumentalities;
- States and their political subdivisions, agencies, and instrumentalities; and
- All persons who purchased their vehicle parts directly from the Defendants or for resale.

**10. WHY ARE THE LAWSUITS CONTINUING IF THERE ARE SETTLEMENTS?**

The Round 4 Settlements have been reached with the Round 4 Settling Defendants (listed in Question 3) as specified in the individual Settlement Agreements. The lawsuits will continue against the defendants who have not settled (“Non-Settling Defendants”).

Additional money may become available in the future as a result of a trial or future Settlements. Alternatively, the litigation may be resolved in favor of the Non-Settling Defendants, and no additional money may become available. There is no guarantee as to what will happen.

Please visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com) for more information or to file a claim.

**THE ROUND 4 SETTLEMENTS’ BENEFITS**

**11. WHAT DO THE ROUND 4 SETTLEMENTS PROVIDE?**

The Round 4 Settlements totaling approximately \$184 million are now being presented to the Court for approval. The Court has already approved the Round 1 Settlements, totaling approximately \$225 million; the Round 2 Settlements, totaling approximately \$379 million; and the Round 3 Settlements, totaling approximately \$433 million. Together, the Round 1 through 4 Settlement Funds total approximately \$1.2 billion. After deduction of attorneys’ fees, incentive awards, notice and claims administration costs, and litigation expenses, as approved by the Court, the Net Settlement Funds will be available for distribution to members of the Settlement Classes who timely file valid claims.

The Round 4 Settlements also include non-monetary relief (*see* Question 15), including cooperation from the Settling Defendants (with the exception of TKH and Delphi) as well as agreements by these Settling Defendants (with the exception of Toyota Gosei and TKH) not to engage in the conduct that is the subject of the lawsuits, as more fully described in the proposed Final Judgments that are available on the Settlement website [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

The Settlement Funds are allocated to the relevant vehicle component cases as follows:



Auto Parts Round 4 Settlements and Settlement Funds		
Automotive Parts Case	Round 4 Settling Defendant	Settlement Fund
Air Conditioning Systems	Mitsubishi Heavy	\$6,840,000.00
	Panasonic	\$760,000.00
Automotive Brake Hoses	Toyoda Gosei	\$659,456.20
Automotive Hoses	Toyoda Gosei	\$5,428,166.52
Body Sealing Products	Green Tokai	\$950,000.00
	Toyoda Gosei	\$27,148,653.36
Ceramic Substrates	Corning	\$26,600,000.00
Automotive Constant-Velocity-Joint Boot Products	Toyoda Gosei	\$716,505.10
Electronic Powered Steering Assemblies	Showa	\$4,133,735.39
Exhaust Systems	ArvinMeritor	\$760,000.00
Fuel Injection Systems	Keihin	\$836,000.00
	Maruyasu	\$108,699.85
	Mikuni	\$2,675,200.00
Heater Control Panels	Tokai Rika	\$1,366,578.08
Ignition Coils	Delphi	\$760,000.00
	Toyo Denso	\$760,000.00
Interior Trim Products	Toyoda Gosei	\$5,089,493.68
Side-Door Latches	Brose	\$2,280,000.00

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<b>Auto Parts Round 4 Settlements and Settlement Funds</b>		
<b>Automotive Parts Case</b>	<b>Round 4 Settling Defendant</b>	<b>Settlement Fund</b>
Occupant Safety Systems	TKH	\$53,200,000.00 <sup>3</sup>
	Tokai Rika	\$28,745,447.27
	Toyoda Gosei	\$5,797,725.14
Power Window Switches	Toyo Denso	\$4,408,000.00
Shock Absorbers	KYB	\$28,880,000.00
	Showa	\$9,926,264.61
Automotive Steel Tubes	Maruyasu	\$5,211,300.15
	Sanoh	\$8,360,000.00
Steering Angle Sensors	Tokai Rika	\$677,714.01
Switches	Tokai Rika	\$3,410,260.64
Valve Timing Control Devices	Mikuni	\$668,800.00
<b>Total (excluding TKH)</b>		<b>\$183,958,000.00</b>

Any interest earned will be added to each of the Settlement Funds. More details about the Round 4 Settlements are provided in the Round 4 Settlement Agreements, available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

### HOW TO GET BENEFITS

#### 12. HOW DO I SUBMIT A CLAIM?

You may be entitled to a portion of the Settlement Funds when a distribution is made to members of the Settlement Classes. If you excluded or exclude yourself from any of the Settlement Classes in the Round 1 through Round 4 Settlements, you will not receive a payment from those funds.

<sup>3</sup> Class Members have a \$53,200,000 authorized claim against TKH in bankruptcy proceeding, but they can expect to receive only a small fraction of this amount for distribution to the Class. For this reason, the authorized claim amount is not included in the total settlement amount listed above. The Class representatives have also reached a settlement with Takata Corp. in Japanese insolvency proceedings. The settlement provides for a payment of 25,000,000 Japanese Yen (equivalent to approximately \$220,000). This settlement as a formal matter is with the Class representatives only, but the proceeds of the settlement will be paid to the same group of purchasers included in the Settlement Class agreed to based on the settlement agreement with Takata Corp.'s U.S. subsidiary, TKH.

However, you will be required to submit a Claim Form to be eligible to receive a payment from any of the Settlement Funds. Claims may be submitted online at [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or by printing and mailing your completed form postmarked by **December 31, 2019** to:

Auto Parts Settlements  
P.O. Box 10163  
Dublin, OH 43017-3163

You may also call 1-877-940-5043, write the Settlement Administrator at the address above, email [info@AutoPartsClass.com](mailto:info@AutoPartsClass.com), or visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com) to obtain a Claim Form and to request assistance in filing a claim.

If you submit a Claim Form at the Settlement website, you will receive future notifications containing additional important information, including information about any future settlements.

### 13. HOW MUCH MONEY CAN I GET?

At this time, it is estimated that each member of the Settlement Classes who submits a valid claim will receive a payment of at least \$100. The minimum payment is per claimant and not per vehicle. However, the actual amount of your recovery will be determined by the revised Plan of Allocation, the terms of which are posted at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

The Court previously approved a Plan of Allocation to distribute the Net Settlement Funds from the earlier settlements. However, Settlement Class Counsel is proposing that the Court approve a revised Plan of Allocation that will apply to all the Settlements from Round 1 through Round 4.

The Settlement Administrator will calculate in accordance with the proposed revised Plan of Allocation the amounts awarded to each Class Member who files a valid claim. Below is a summary of how claims will be paid:

- Each claimant will be paid a minimum of \$100 from the Net Settlement Funds.
- Claims exceeding \$100 will be paid \$100 plus a pro rata (or proportional) share of the remaining applicable Net Settlement Funds as determined separately for each automotive part (after paying all of the \$100 minimum payments).
- If the Net Settlement Funds are insufficient to allow a minimum payment of \$100 to each claimant, the amount to be paid to each claimant will be adjusted based on a pro rata basis.

The pro rata portion of the payment amount will be based on a ratio consisting of the claimant's total number of vehicles purchased or leased or replacement parts purchased, and the total number of vehicles purchased or leased and replacement parts purchased by other claimants. Claims based on vehicles containing automotive parts that were allegedly specifically targeted by Defendants' alleged collusive conduct will receive more money.

Payments will be based on a number of factors, including at least the number of valid claims filed by all members of the Settlement Class in question and the number of (1) qualifying new vehicles purchased or leased or (2) qualifying replacement parts purchased. It is possible that any money

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)

remaining after claims are paid will be distributed to charities, governmental entities, or other beneficiaries approved by the Court. No matter how many claims are filed, no money will be returned to the Settling Defendants after the Court finally approves the Round 4 Settlements.

In order to receive a payment from any of the Settlements (Round 1 through Round 4), you will need to file a valid Claim Form (*see* Question 12). If you already submitted a Claim Form, you do not need to file another claim for that specific vehicle or replacement part. However, if you purchased additional vehicles or replacement parts, which were not mentioned in your previous Claim Form, you should file a new Claim Form for the additional vehicles or replacement parts.

#### **14. WHEN WILL I GET A PAYMENT?**

Payments may be distributed to members of the Settlement Classes after: (1) the Court grants final approval to the Round 4 Settlements; (2) any appeals from such approvals are resolved (appeals can take several years to conclude); (3) the claims administration process is completed; and (4) the Court approves the allocation of the Net Settlement Funds.

#### **15. WHAT IS THE NON-MONETARY RELIEF?**

With the exception of Toyoda Gosei and TKH, the Round 4 Settling Defendants have agreed not to engage in certain specified conduct that would violate the antitrust laws that are at issue in these lawsuits for a period of two years. Additionally, all of the Round 4 Settling Defendants except TKH and Delphi will cooperate with the Class representatives in their ongoing litigation against the Non-Settling Defendants.

### **REMAINING IN THE CLASSES**

#### **16. WHAT HAPPENS IF I REMAIN IN THE SETTLEMENT CLASSES?**

If the Round 4 Settlements become final, you will give up your right to sue these Settling Defendants on your own for the claims described in the Settlement Agreements unless you exclude yourself from one or more of the Settlement Classes. You also will be bound by any decisions by the Court relating to any Round 4 Settlements from which you do not exclude yourself.

In return for paying the Settlement amounts and providing the non-monetary benefits, the Round 4 Settling Defendants (and certain related entities defined in the Settlement Agreements) will be released from claims relating to the alleged conduct involving the vehicle parts identified in the Settlement Agreements. The Round 4 Settlement Agreements describe the released claims in detail, so read them carefully since those releases will be binding on you if the Court approves these Settlements. If you have any questions, you can talk to Class Counsel listed in Question 20 for free, or you can, of course, talk to your own lawyer (at your own expense). The Round 4 Settlement Agreements and the specific releases are available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

## EXCLUDING YOURSELF FROM THE SETTLEMENT CLASSES

### 17. HOW DO I GET OUT OF THE SETTLEMENT CLASSES?

To exclude yourself from one or more of the Settlement Classes, you must send a letter by mail stating that you want to be excluded from *In re Automotive Parts Antitrust Litigation* and specifying from which Settlement Class or Classes (including the specific automotive part case) you wish to be excluded. If you did not timely request to be excluded from the Round 1, Round 2 or Round 3 Settlement Classes, you may not request to be excluded from those Settlement Classes at this time. You may only request to be excluded from the Settlement Classes for the Round 4 Settlements.

Your letter must also include:

- Your name, address, and telephone number;
- Documents reflecting your purchase or lease of a new eligible vehicle and/or purchase of the applicable replacement part:
  - Purchase or lease documentation should include: (a) the date of purchase or lease, (b) the make and model year of the new vehicle, and (c) the state where you resided when the new vehicle was purchased or leased, or as to businesses, the principal place of business;
  - Replacement part documentation should include: (a) the date of purchase, (b) type of replacement part purchased, and (c) the state where you resided when the replacement part was purchased, or as to businesses, the principal place of business; and
- Your signature.

If you are seeking to exclude yourself from one or more of the Round 4 Settlement Classes, you are also requested (but not required) to state in your letter the number of new vehicles you purchased from January 1, 1990 to July 20, 2019.

Any request for exclusion must be mailed to the address immediately below, and must be **received** no later than **November 19, 2019**:

Automotive Parts Indirect Exclusions  
P.O. Box 10163  
Dublin, OH 43017-3163

### 18. IF I DON'T EXCLUDE MYSELF, CAN I SUE FOR THE SAME THING LATER?

No. Unless you exclude yourself, you give up any right to sue the Round 4 Settling Defendants for the claims being released in this litigation.

### 19. IF I EXCLUDE MYSELF, CAN I STILL GET MONEY BENEFITS?

No. If you exclude yourself from the Settlement Classes in any of the Round 4 Settlements, you will not get any money as a result of the Settlement in that case. However, you may exclude

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)

yourself from one or more of the Settlement Classes for any of the Round 4 Settlements but remain in the Settlement Classes for other Round 4 Settlements. In that case, you may receive money from the Round 4 Settlements for the Settlement Classes in which you remain a Class member.

### THE LAWYERS REPRESENTING YOU

#### 20. DO I HAVE A LAWYER REPRESENTING ME?

The Court has appointed the following law firms as Class Counsel to represent you and all other members of the Classes:

Adam Zapala Cotchett, Pitre, & McCarthy, LLP 840 Malcolm Road Burlingame, CA 94010	Hollis Salzman Robins Kaplan LLP 399 Park Avenue Suite 3600 New York, NY 10022	Marc M. Seltzer Susman Godfrey L.L.P. 1900 Avenue of the Stars Suite 1400 Los Angeles, CA 90067
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You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

#### 21. HOW WILL THE LAWYERS BE PAID?

At the upcoming Final Fairness Hearing, Class Counsel may ask the Court (a) to award incentive awards to named Plaintiffs, (b) to reimburse Class Counsel for certain costs and expenses, and (c) for attorneys' fees based on their services in this litigation, not to exceed 25% of the approximately \$184 million in additional Settlement Funds resulting from the Round 4 Settlements after deducting reimbursable litigation costs, incentive awards, and expenses. Any payment to the attorneys will be subject to Court approval, and the Court may award less than the requested amount. The attorneys' fees, costs, incentive awards, and litigation expenses that the Court orders, plus the costs to administer the Round 4 Settlements, will come out of the Settlement Funds. Class Counsel may seek additional attorneys' fees, costs, and expenses from any additional Settlements or recoveries obtained in the future.

When Class Counsel's motion for fees, costs, and expenses is filed, it will be available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com). The motion will be filed on or before October 31, 2019 and will be posted on the website shortly thereafter for any objections to or comments on the motion from members of the Settlement Classes (*see* Question 22).

### OBJECTING TO THE ROUND 4 SETTLEMENTS

#### 22. HOW DO I OBJECT TO OR COMMENT ON THE ROUND 4 SETTLEMENTS?

If you have objections to or comments about any aspect of (a) one or more of the Round 4 Settlements, (b) the revised Plan of Allocation as it applies to members of any of the Settlement Classes (in Rounds 1 through 4), or (c) the motion by Class Counsel for attorneys' fees, costs, and

incentive awards as it applies to members of the Round 4 Settlement Classes, then you may express your views to the Court. You can only object to or comment on these matters if you do not exclude yourself from the applicable Settlement Class or Classes.

To object to or comment on a Round 4 Settlement, the revised Plan of Allocation, or the motion for attorneys' fees, costs, and incentive awards, you must do so in writing. Your letter must specify which Settlement (including the specific vehicle part) you are objecting to and include the following in your objection letter:

- Your name, address, and telephone number;
- Documents reflecting your purchase or lease of a new eligible vehicle and/or purchase of the applicable replacement part:
  - Purchase or lease documentation should include: (a) the date of purchase or lease, (b) the make and model year of the new vehicle, and (c) the state where you resided when the new vehicle was purchased or leased, or as to businesses, the principal place of business;
  - Replacement part documentation should include: (a) the date of purchase, (b) type of replacement part purchased, and (c) the state where you resided when the replacement part was purchased, or as to businesses, the principal place of business.;
- The name of the Settling Defendant whose Settlement you are objecting to or commenting on;
- The vehicle part case, including the case name and case number, that is the subject of your objections or comments. (You can find the case numbers at [www.AutoPartsClass.com](http://www.AutoPartsClass.com). Go to the "Class Action Complaints" under the "Court Documents" tab to find the cases by part.);
- The reasons you object to the Settlement, revised Plan of Allocation, motion for attorneys' fees, or incentive awards, along with any supporting materials; and
- Your signature.

Any comment or objection must be in writing, mailed to **both** of the addresses listed immediately below, and must be received by both the Clerk of the Court and the Notice Administrator, no later than **November 19, 2019**. The addresses are:

<b>Court</b>	<b>Notice Administrator</b>
U.S. District Court for the Eastern District of Michigan Clerk of the Court Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 564 Detroit, MI 48226	Auto Parts Settlements Objections P.O. Box 10163 Dublin, OH 43017-3163

Any objection or comment must also be timely filed with the Court (on or before November 19, 2019) in the case file (or docket) of the specific automotive parts case or cases that are the subject

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)

of your objection or comments (e.g., *In re Heater Control Panels*, No. 2:12-cv-00403). Objections or comments filed only in *In re Automotive Parts Antitrust Litigation* (the Master Docket, 2:12-md-02311), will not satisfy this requirement.

You will not have an opportunity to speak at the Court's Fairness Hearing (*see* Question 24) unless you first submit a complete, valid, and timely written objection and request the opportunity to speak at the Fairness Hearing.

**23. WHAT IS THE DIFFERENCE BETWEEN EXCLUDING MYSELF FROM THE SETTLEMENT CLASSES AND OBJECTING TO THE ROUND 4 SETTLEMENTS?**

If you exclude yourself from one or more of the Round 4 Settlement Classes, you are telling the Court that you do not want to participate in the Round 4 Settlement(s) from which you exclude yourself. Therefore, you will not be eligible to receive any payment from those Round 4 Settlement(s), and you will not be able to object to them. Objecting to a Round 4 Settlement simply means telling the Court that you do not like something about the Settlement. Objecting does not make you ineligible to receive a payment.

**THE FINAL FAIRNESS HEARING**

The Court will hold a hearing to decide whether to approve the Round 4 Settlements and any requests by Settlement Class Counsel for fees, costs, expenses, and Class representative incentive awards. You may attend and you may ask to speak, but you do not have to do so.

**24. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE ROUND 4 SETTLEMENTS?**

The Court will hold a Final Fairness Hearing at **11:00 a.m. on December 10, 2019**, at the United States Courthouse, 231 W. Lafayette Blvd, Detroit, MI 48226, Room 250. The hearing may be moved to a different date or time without additional notice, so check [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or call 1-877-940-5043 for current information. At this hearing, the Court will consider whether the Round 4 Settlements and the revised Plan of Allocation are fair, reasonable, and adequate. If there are objections or comments, the Court will consider them at that time and may listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel. At or after the hearing, the Court will decide whether to approve the Round 4 Settlements.

**25. DO I HAVE TO ATTEND THE HEARING?**

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend at your expense. If you send an objection or comment, you do not have to come to Court to talk about it. As long as you mailed your complete and valid written objection on time, as described above in Question 22, the Court will consider it. You may also hire your own lawyer at your own expense to attend on your behalf, but you are not required to do so.



**26. MAY I SPEAK AT THE HEARING?**

If you send an objection or comment on the Round 4 Settlements, revised Plan of Allocation, or motion for attorney's fees, costs, and incentive awards, as described in Question 22, you may have the right to speak at the Final Fairness Hearing as determined by the Court. You cannot speak at the hearing if you do not submit a timely written objection or comment as described in Question 22. You cannot speak at the hearing if you exclude yourself from that specific Settlement Class.

**THE TRIALS**

**27. WHEN AND WHERE WILL THE TRIALS AGAINST THE NON-SETTLING DEFENDANTS TAKE PLACE?**

If the remaining case is not dismissed or settled, the Plaintiffs will have to prove their claims against the Non-Settling Defendants at trial. Trial dates and locations have not yet been set.

At the trial, a decision will be reached about whether the Plaintiffs or the Non-Settling Defendants are right about the claims in the lawsuits. There is no guarantee that the Plaintiffs will win any money or other benefits for members of the Classes at trial.

**28. WHAT ARE THE PLAINTIFFS ASKING FOR FROM THE NON-SETTLING DEFENDANTS?**

The Class representatives are asking for money for members of the Settlement Classes in the District of Columbia and 30 states listed in Question 8 above from Non-Settling Defendants. The Class representatives are also seeking a nationwide court order to prohibit the Non-Settling Defendants from engaging in the alleged behavior that is the subject of the lawsuits.

**29. WILL I GET MONEY AFTER THE TRIALS?**

If the Plaintiffs obtain money or benefits as a result of a trial or settlement with the Non-Settling Defendants, then members of the classes in question will be notified about how to ask for a share or what their other options are at that time. That information will be available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com). With the approval of the Court, notice of any subsequent settlements and related matters may be given only on the website. These things are not known right now.

**GET MORE INFORMATION**

**30. HOW DO I GET MORE INFORMATION?**

This Notice summarizes the Round 4 Settlements. More details are in the Round 4 Settlement Agreements. You can view or get copies of the Settlement Agreements and more information about all the Settlements at [www.AutoPartsClass.com](http://www.AutoPartsClass.com). In addition, the full proposed revised Plan of Allocation is available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com). You also may write with questions to Auto Parts Settlements, P.O. Box 10163, Dublin, OH 43017-3163, send an email to [info@AutoPartsClass.com](mailto:info@AutoPartsClass.com), or call the toll-free number, 1-877-940-5043. If you file a claim, you will be notified of any future settlements and other information concerning these cases.

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)



# Exhibit C

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**From:** DoNotReply <donotreply@legalclaimsadmin.com>  
**Sent:** Tuesday, September 16, 2019 11:39 AM  
**To:** [REDACTED]  
**Subject:** Auto Parts Settlements Update

**You Could Get \$100 or More From Auto Parts Settlements  
Claims Deadline Set for December 31, 2019**

**[FILE A CLAIM NOW!](#)**

You are receiving this email because you registered to receive updated information about the Automotive Parts Settlements.

Additional defendants have agreed to new Settlements resolving claims that they fixed the price of auto parts. More information is available for your review on the website, [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

**You are not required to provide documentation at the time you file a claim.**

You can file a claim now by clicking on the link above. Submitting a claim is easy. You can also file a claim by mail. The deadline to file a claim is **December 31, 2019**. You could get \$100 or more if you qualify. If you already filed a claim, you do not need to file one again for the same vehicle or part to get a payment. You should file an additional claim if you have new vehicles or parts to report.

Registration Number: 99999999

# Exhibit D

**Automotive Parts Settlements**  
**P.O. Box 10163**  
**Dublin, OH 43017-3163**

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PAID

**Update: Auto Parts Settlements Total Over \$1.2 Billion**  
**Claims Deadline Set for December 31, 2019**

YAA00012639489



JANE CLAIMANT  
123 A STREET  
ANYTOWN, WA 98101

# You Could Get \$100 or More from Auto Parts Settlements

## *File a Claim Now*

<b>What is This About?</b>	<p>You are receiving this notice because you registered to receive updated information about the Automotive Parts Settlements. Additional defendants have agreed to new Settlements resolving claims that they fixed the price of auto parts. More information is available for your review on the website, <b><a href="http://www.AutoPartsClass.com">www.AutoPartsClass.com</a></b>.</p> <p><b>You are not required to provide documentation at the time you file a claim.</b></p>
<b>How to File a Claim?</b>	<p>Submitting a claim is easy. <b>Go to <a href="http://www.AutoPartsClass.com">www.AutoPartsClass.com</a> to file a claim online.</b> You can also file a claim by mail. The deadline to file a claim in these Settlements is <b>December 31, 2019</b>. You could get \$100 or more if you qualify. If you already filed a claim, you do not need to file one again for the same vehicle or part to get a payment. You should file an additional claim if you have new vehicles or parts to report.</p>

**For More Info or a Claim Form:**

**[www.AutoPartsClass.com](http://www.AutoPartsClass.com) 1-877-940-5043 [info@AutoPartsClass.com](mailto:info@AutoPartsClass.com)**

# Exhibit E

**Automotive Parts Settlements**  
**P.O. Box 10163**  
**Dublin, OH 43017-3163**

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**Auto Parts Settlements Total Over \$1.2 Billion**  
**File Your Claim by December 31, 2019**

YAA00012639489



JANE CLAIMANT  
123 A St  
ANYWHERE, WA 98101

# You Could Get \$100 or More from Auto Parts Settlements

## *File a Claim Now*

<b>What is This About?</b>	<p>You are receiving this notice because your company may have purchased (or leased) new vehicles or parts that may be included in the Automotive Parts Settlements. You can now file a claim for money, and your other rights could be affected.</p> <p>Defendants have agreed to Settlements resolving claims that they fixed the price of certain auto parts. More information is available for your review on the website, <b><a href="http://www.AutoPartsClass.com">www.AutoPartsClass.com</a></b>.</p>
<b>How to File a Claim?</b>	<p>Submitting a claim is easy. <b>Go to <a href="http://www.AutoPartsClass.com">www.AutoPartsClass.com</a> to file a claim online.</b> You can also file a claim by mail. The deadline to file a claim in these Settlements is <b>December 31, 2019</b>. You could get \$100 or more if you qualify. If you already filed a claim, you do not need to file one again for the same vehicle or part to get a payment. You should file an additional claim if you have new vehicles or parts to report.</p>

**For More Info or a Claim Form:**

**[www.AutoPartsClass.com](http://www.AutoPartsClass.com) 1-877-940-5043 [info@AutoPartsClass.com](mailto:info@AutoPartsClass.com)**



# Exhibit F

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**From:** Auto Parts Class <broadcast@exact-emailing.com>  
**Sent:** Friday, September 13, 2019 8:40 AM  
**To:** Pinkerton, Brian  
**Subject:** TEST: Attention Toyota Car Owners

## YOU COULD GET \$100 OR MORE FROM AUTO PARTS SETTLEMENTS

### FILE A CLAIM NOW!

Brian,

You are receiving this email because records show you purchased a Toyota Camry that is included in the Automotive Parts Settlements. You can now file a claim for money, and your rights may be affected.

Defendants have agreed to Settlements resolving claims that they fixed the price of auto parts. More information is available for your review at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

Submitting a claim is easy. No documentation is required at this time. Click on the link below to file a claim online by **December 31, 2019**. If you already filed a claim, you do not need to file one again for the same vehicle or part to get a payment. You should file an additional claim if you have new vehicles or parts to report.

**FILE A CLAIM**

*Unsubscribe from our emails by [clicking here](#)*

*Postal opt-outs can be sent to: Opt-out Compliance, 1923 Bragg St #140-3025, Sanford, NC 27330  
This email was sent to you because you are registered to receive our 3rd party partner emails*